

REMARKS

Upon entry of the present amendment, claims 1-3, 8 and 10 will have been amended. Claims 12 and 13 will have been submitted for consideration by the Examiner. Thus, claims 1-13 are pending in the application.

In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the outstanding rejection set forth in the above-mentioned Official Action. Such action is believed to be appropriate and proper and is thus respectfully requested, in due course.

In the outstanding Official Action, the Examiner rejected claims 1-11 under 35 USC §103(a) as being unpatentable over Ando et al. (US 6,580,873) in view of Lin et al. (US 6,574,417). Applicants respectfully disagree and thus traverse.

Applicants' invention, as recited in claim 1, is directed to a video data file integrating apparatus, including, *inter alia*, a conversion processor that converts original un-integrated management information files and original un-integrated video data files into an integrated management information file and an integrated video data file, respectively. The conversion processor converts the original un-integrated directory file structure corresponding to the first recording medium into reproduction control information in a data format of the integrated management information file so as to be recorded in the second medium in the integrated management information file. The reproduction control information is used in reproducing the integrated video data file and for recovering the original un-integrated directory file structure.

It is respectfully submitted that none of the references, nor any combination of references disclose the combination of features recited at least in Applicants' claim 1.

The Examiner indicated that the original PGC and the user-defined PGC shown in Fig. 36 of Ando et al. respectively correspond to the original directory file structure and the reproduction control information, as recited in claim 1. The user-defined PGC defines playback order of cells (programs) based on the user's request. However, the user-defined PGC is not used for recovering the original un-integrated directory file structure, as recited in claim 1. As shown in Figs. 5, 30 and 36, for example, the playback order of the initially recorded contents has been changed by the user using a user-defined PGC (col. 43, line 26). The user-defined PGC information is converted into addresses of VOBUs that form each of the cells to be played back (col. 43, line 38). Thus, although the order of playback or reproduction has been changed, the initially recorded content (e.g., video data) has not been changed. Accordingly, the user-defined PGC does not need to be used for recovering the original un-integrated directory file structure, since the original arrangement (directory structure) of contents has not been changed, and thus "recovery" is not necessary.

On the contrary, and as a non-limiting example, with reference to the paragraph bridging pages 16-17, for example, the reproduction control information of the present invention includes information of how the original video data or management information are arranged, to recover the arrangement before the integration. As described in the paragraphs beginning at the first paragraph of page 17, the reproduction control information is used to recover the data format of the portable device (original un-integrated data) from the data stored in the media 312, in addition to reproducing the data stored in the media 312.

According to the features of the present invention, the conversion processor converts the original un-integrated management information files and the original un-integrated video data files into an integrated management information file and an integrated video data file,

respectively. Thus, since original structure of record has been changed, the reproduction control information includes information to recover the original (i.e. before conversion) integrated directory file structure, as well as reproducing the integrated (i.e. after conversion) video data file.

Lin et al. discloses the original read-only format of the disc 14 is re-formatted into the generic data format. The re-formatted data is re-stored back on the disc 14 (col. 10, line 26). However, Lin et al. does not disclose that the data for recovering original read-only format is generated or stored with the re-formatted data.

Accordingly, at least based on the lack of disclosure regarding the above described and explicitly claimed feature and the advantages achieved thereby, Applicants submit that none of the cited references, even if combined, disclose or suggest the combination of features as recited in the Applicants' independent claim 1, and the Examiner's rejection of independent claim 1 under 35 U.S.C. §103(a) is improper.

Applicants' invention as recited in each of claims 2, 3, 8 and 10 is directed to a video data file integrating apparatus, a video data file integrating method, an integrated video data file reproducing apparatus or an integrated video data file reproducing method that includes features that are similar to the features recited in claim 1 and are not disclosed by the cited combination of references for at least the reasons discussed above.

Each dependent claim in the present application is respectfully submitted to be patentable over the references relied upon based upon its dependence from a shown to be allowable base claim, as well as based upon its own additional recitation.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the outstanding rejection, together with an indication of the allowability of the claims pending in the present application, in due course.

SUMMARY AND CONCLUSION

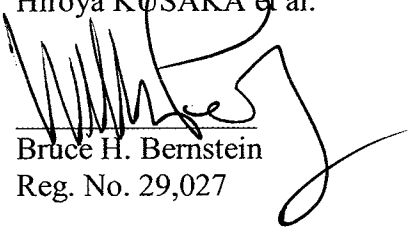
Applicants have made a sincere effort to place the present application into condition for allowance and believe that they have now done so. Applicants have amended the claims to more clearly emphasize distinctions between the present invention and the disclosure of the references relied upon by the Examiner. Applicants have also submitted a couple of new claims for consideration by the Examiner.

Applicants have additionally discussed the disclosure of the references and pointed out the shortcomings thereof. Further, Applicants have, with respect to the explicit recitations of the pending claims, pointed out clear deficiencies in the references applied thereagainst. Accordingly, Applicants have provided a clear and convincing evidentiary basis supporting the patentability of all of the claims in the present application and respectfully request an indication to such effect in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
Hiroya KUSAKA et al.



Bruce H. Bernstein
Reg. No. 29,027

William Pieprz
Reg. No. 33,630

September 27, 2010
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191